

THE HONORABLE KYMBERLY K. EVANSON

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

JAVIER TAPIA,

Plaintiff,

v.

NAPHCARE, INC.,

Defendant.

NO. 2:22-cv-01141-KKE

**STIPULATED MOTION TO ALLOW
PLAINTIFFS LEAVE TO FILE AN
OVERLENGTH RESPONSE IN
OPPOSITION TO NAPHCARE, INC.'S
POST TRIAL MOTIONS**

NOTING DATE: May 20, 2025

Pursuant to Local Civil Rule 7(f) the parties hereby jointly move the Court for entry of an order to permit Plaintiff to file an over-length response to Defendant NaphCare's Rule 50(b) & 59 Motions for Judgment as a Matter of Law, New Trial, and/or Remittitur (Dkt. 326). The Court previously granted NaphCare's motion to combine its post-trial motions and ordered that the brief in opposition shall not exceed 8,400 words, and reply briefs should not exceed 4,200 words. (Dkt. 311). The Parties conferred and agree that, given the complexity of issues, it will best serve the interests of justice to allow for additional word count upon response. The Parties respectfully request that the Court permit an additional 2,400 words for the brief in opposition and 1,200 words for the reply brief.

DATED this 20th day of May, 2025.

PLAINTIFF'S MOTION FOR LEAVE TO FILE OVERLENGTH
RESPONSE IN OPPOSITION TO NAPHCARE, INC.'S
POST TRIAL MOTIONS - 1
(2:22-CV-01141-KKE)

Galanda Broadman PLLC
8606 35th Avenue NE, Ste. L1
Mailing: P.O. Box 15146
Seattle, WA 98115
(206) 557-7509

I certify that this memorandum contains 131 words, in compliance with the Local Civil Rules.

GALANDA BROADMAN, PLLC

s/ Corinne Sebren

Corinne Sebren, WSBA #58777
Ryan D. Dreveskracht, WSBA #42593
Attorneys for Plaintiffs
P.O. Box 15146 Seattle, WA 98115
(206) 557-7509 Fax: (206) 299-7690
Email: corinne@galandabroadman.com
Email: ryan@galandabroadman.com

Attorneys for Plaintiff

s/ Edwin S. Budge

Edwin S. Budge, WSBA #24182
Budge & Heipt, PLLC
808 East Roy Street
Seattle, WA 98102
Telephone: (206) 624-3060
Email: ed@budgeandheipt.com

Attorney for Plaintiff

s/ Shae McPhee

Shae McPhee, WSBA No. 62438
David A. Perez, WSBA No. 43959
Juliana Bennington, WSBA No. 60357
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
E-mail: Dperez@perkinscoie.com
JBennington@perkinscoie.com
SMcphee@perkinscoie.com

Jacob Dean (Admitted Pro Hac Vice)
Perkins Coie LLP
700 13th St NW #600,
Washington, DC 20005
Telephone: 202.654.3396
Facsimile: 310.843.1283
E-mail: JacobDean@perkinscoie.com

Michael Huston (Admitted Pro Hac Vice)
Perkins Coie LLP
2525 E Camelback Rd, Suite #500,
Phoenix, AZ 85016

Telephone: 1.602.351.8000
Facsimile: 1.602.648.7000
E-mail: MHuston@perkinscoie.com

Lauren Pardee Ruben
(Admitted Pro Hac Vice)
Perkins Coie LLP
1900 Sixteenth Street, Suite 1400
Denver, CO 80202-5255
Telephone: 1.303.291.2300
Facsimile: 1.303.291.2400
E-mail: LRuben@perkinscoie.com

Attorneys for Defendant NaphCare, Inc.

ORDER

THIS MATTER comes before the Court on the Parties' Stipulated Motion to File Overlength Response. Having been fully advised on the premises, this Stipulated Motion To File an Overlength Response is GRANTED. Plaintiff's brief in opposition to NaphCare's Rule 50(b) & 59 Motions for Judgment as a Matter of Law, New Trial, and/or Remittitur shall not exceed 10,800 words. Defendant's reply brief shall not exceed 5,400 words.

DATED this 22nd day of May, 2025



The Honorable Kymberly K. Evanson